

Closure Plan for BOP Baghouse Dust Drum Storage Area  
Site S-5  
EPA I.D. No. OHD 004 222030  
United States Steel Corporation  
Lorain Plant  
Lorain, Ohio

EPA Region 5 Records Ctr.



320890

Introduction

The closure plan for drum storage site S-5 is revised to comprehend changing the site designation from that of a storage facility permitted under interim status to that of a temporary accumulation site under the 90-day waste accumulation provision of 40 CFR 262.34 and Ohio EPA Hazardous Waste Rule 3745-52-34.

General Facility Description

United States Steel Corporation (USSC) has operated a hazardous waste drum storage area, designated at Site S-5, within the Lorain Plant boundaries from October 1980 to January 13, 1984. USSC is permitted under interim status regulations, Hazardous Waste Permit No. 02-47-0108, to operate Site S-5 and other hazardous waste facilities within the Lorain Plant. Site S-5 is used for the temporary accumulation of BOP baghouse dust, collected during the production of leaded steel. All BOP baghouse dust is contained in DOT approved, 55-gallon drums and is subsequently shipped offsite for disposal.

Site S-5 consists of a 460-square yard area enclosed by a fence and covered by an asphalt pad. Drums are stored upright in a single layer inside the enclosed area. The design maximum holding capacity of Site S-5 is 460 drums.

Waste Characterization

The waste accumulated in Site S-5 is BOP baghouse dust, collected in the baghouse during the production of leaded steel. Leaded steel dust is not a listed EPA hazardous waste but contains quantities of lead

and is suspected to exhibit the characteristic of EP toxicity for lead (D008).

#### Maximum Waste Inventory

At any time during the life of the facility, the maximum inventory of 55-gallon drums in Site S-5 is 460.

#### Normal Operating Procedure

BOP Baghouse dust, collected during heats producing leaded steels, is transferred from the Baghouse hopper to 55-gallon drums which are then sealed and placed in Site S-5. Typically, the drums are accumulated until there is a sufficient number to comprise a full load for a drum transporter. The drums are then transported offsite for disposal.

#### Removal of Waste Inventory

On January 12 and 13, 1984 a total of 130 drums containing leaded steel dust were removed from Site S-5 and transported by K-D Industrial Services (Romulus, Michigan) to Wayne Disposal, Inc. Site #2 (Belle-ville, Michigan) for disposal. These shipments constituted the removal of the entire waste inventory from Site S-5.

#### Procedures for Facility Decontamination

Although Site S-5 is to be closed as a permitted drum storage facility under interim status regulations, the facility will continue to be operated as a temporary accumulation site under the 90-day waste accumulation provision and subject to regulations applicable to generators of hazardous waste as well as the special requirements of the 90-day waste accumulation provision. It is USSC's understanding, following inquiries with Ohio EPA personnel, that a complete facility closure plan is not required if the facility will continue to be operated but that the entire waste inventory and all spilled material,

if any, must be removed from the site prior to beginning the first 90-day waste accumulation period. Facility decontamination is not required under this "partial" facility closure and hence, is not addressed in this closure plan.

#### Implementation of Temporary Accumulation Under the 90-Day Waste Accumulation Provision

In accordance with the above closure plan guidelines, USSC has implemented a 90-day waste accumulation period for the BOP baghouse dust drum storage area. The first accumulation period began on January 15, 1984 with the placement of the first drum of leaded steel dust in Site S-5 following the complete removal of all the waste inventory on January 12 and 13, 1984. This drum and all subsequent drums brought to Site S-5 are labeled with the date of arrival for tracking each period of accumulation. In addition to labeling, Lorain Works personnel will comply with the provisions of 40 CFR 262.34 and Ohio EPA Hazardous Waste Rule 3745-52-34 regarding the 90-day accumulation period as well as all standards applicable to generators of hazardous waste (40 CFR 262 and Ohio EPA Hazardous Waste Rules 3745-52-10 through 3745-52-43, respectively).

#### Closure Certification

On the approval of this closure plan by the Ohio EPA, an independent registered professional engineer will inspect Site S-5 and examine hazardous waste manifests to certify that all waste inventory had been removed from the site by January 13, 1984 and properly disposed and that Site S-5 is properly managed under the 90-day waste accumulation provision of the regulations. This certification will attest to the closure of the site in accordance with the approved plan and will also serve to confirm the January 15, 1984 date as the initiation of the 90-day accumulation period.